

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-10

**FIRST SET OF INFORMATION REQUESTS TO  
BAY STATE GAS COMPANY**

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The Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Company") the following Information Requests.

**Instructions**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Company's 2002 SQ report filed on January 31, 2003 ("SQ Filing"), as supplemented on February 13, 2003.
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later than March 11, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "**historical data**" refers to data for the years **1992 through 2001**.
5. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which

information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the responses to Caroline M. O'Brien, Hearing Officer, (2) copies to Glenn Shippee, Rates and Revenue Requirements Division, and four (4) copies to Alexander Kofitse, Gas Division.

### **Requests**

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| DTE 1-1 | Please provide historical data on the information provided in the column entitled "Service Appointments Met as Scheduled." Present the data in a tabular form, one table per year, in the same fashion as the data are presented for 2002 in the Company's SQ Filing at Att. D.        |
| DTE 1-2 | Please provide historical data on the information provided in the column entitled "Consumer Division Cases" (per 1000 customers). Present the data in a tabular form, one table per year, in the same fashion as the data are presented for 2002 in the Company's SQ Filing at Att. E. |
| DTE 1-3 | Please provide historical data on the information provided in the column entitled "Lost Work Time Rate and Restricted Work Day Rate." Present the data in a tabular form, one table per year, in the same fashion as the data presented for 2002 in the Company's SQ Filing at Att. F. |
| DTE 1-4 | Please provide historical data on the information provided in the column entitled "Response to Odor Calls." Present the data in a tabular form, one table per year, in the same fashion as the data presented for 2002 in the Company's SQ Filing at Att. G.                           |
| DTE 1-5 | Please provide historical data on the information provided in the column entitled "Billing Adjustments." Present the data in a tabular form, one table per year, in the same fashion as the data presented for 2002 in the Company's SQ Filing at Att. H.                              |

- DTE 1-6 Please provide historical data on the information provided in the column entitled “Telephone Service Factor” (Non-emergency and Emergency calls). Present the data in a tabular form, one table per year, in the same fashion as the data presented for 2002 in the Company’s SQ Filing at Att. I.
- DTE 1-7 Please provide historical data on the information provided in the column entitled “On-Cycle Meter Readings.” Present the data in a tabular form, one Table per year, in the same fashion as the data presented for 2002 in the Company’s SQ Filing at Att. J.
- DTE 1-8 Please refer to the Company’s SQ Filing at 10 and SQ Filing at Att. K. The Company states that the SQ Filing includes results from two surveys: Residential Customer Survey and Service Contact Survey. Provide copies of the two customer satisfaction surveys conducted by the third party vendor. Include the research methodology and other survey instruments used in conducting the surveys.
- DTE 1-9 The Company states that it conducted customer satisfaction surveys in prior years (SQ Filing at 10; SQ Filing at Att. L).
- (a) explain the meaning of the percentages and show how they were calculated;
  - (b) provide historical data of the customer satisfaction surveys;
  - (c) discuss the similarities and differences in methodology among the customer satisfaction surveys conducted by the Company in every year and, also, present the historical data in the same fashion as the results for 2002;
  - (d) provide a satisfaction rating (in percentages similar to the percentages shown in the SQ Filing at Att. L) for the Company’s 2002 performance; and,
  - (e) explain whether the Company is satisfied with the trend in satisfaction rating over the past ten years.
- DTE 1-10 The Company states that it includes current and ten-year historical data regarding the information provided in the column entitled “Unaccounted-for-Gas” (SQ Filing at 11; SQ Filing at Att. N).
- (a) Explain why the percentages for the following years are negative: 2001, 1999, 1998, and 1996; and,
  - (b) Provide the historical data in Mcf units.

DTE 1-11 Regarding the information provided in the column entitled “Customer Service Guarantees” (SQ Filing at 11; SQ Filing at Att. M), please provide a table in the same fashion as the table in Attachment M showing the historical data for both “Failure to Keep Appointments Scheduled” and “Failure to Notify Customers of a Panned Service Interruption.”

DTE 1-12 Please explain how each of the following SQ measures were recorded and measured:

- a) Telephone Answering Factor;
- (b) Emergency Answering;
- (c) Service Appointments Kept;
- (d) Meter Reads;
- (e) Bill Adjustments;
- (f) Lost Time Accident Rate;
- (g) Response to Odor Calls;
- (h) Restricted Work Day Rate;
- (I) Unaccounted for Gas; and,
- (j) Restricted Work Day Rate.

In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.

DTE 1-13 Please answer the following questions with regard to the information provided in the column entitled “Capital Expenditure Information” (SQ Filing at Att. O).

- (a) Justify the dollars amount of \$45,709 for “Replacement-Uprate” in 2000 while the units equal zero (Att. O at 6).
- (b) Justify the dollars amount of \$343,588 for “Replacement-Cathodic Protection” in 2002 while the units equal zero (Att. O at 2).
- (c) Justify the negative dollars amount of \$80,462 for “Replacement-Uprate” in 2002 while the units equal zero (Att. O at 2).
- (d) Provide the Company’s total capital expenditure for the period 1992-2002.

DTE 1-14 Please answer the following questions with regard to the information provided in the column entitled “Replacement Expenditure Information” (SQ Filing at Att. O).

- (a) Discuss why the item “Replacements Water Heaters” was a part of “Replacement” category before and not after 1994.
- (b) Explain why the item “Joint Sealing” was a part of the “Replacements” category after 1994 and not before.

- (c) Discuss why the item “Misc. Meter Barriers” is a part of “Replacements” after 1994 and before.

DTE 1-15 Please explain why historical data is not available for each year in every SQ penalty measure and SQ reporting requirement, as applicable.